

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
C.A. No. 3:21-cv-00674-MOC-DSC**

BRIAN D. GREEN,

Plaintiff,

V.

SMITH DEBNAM NARRON DRAKE
SAINTSING & MYERS, LLP,
JERRY T. MYERS, and
MELISSA A. TULIS,

Defendants.

**MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S AMENDED ORIGINAL COMPLAINT**

NOW COME the defendants Smith Debnam Narron Drake Saintsing & Myers, LLP, Jerry T. Myers, and Melissa A. Tulis, by and through counsel, and hereby move this Court to extend the time to answer or otherwise respond to Plaintiff's Amended Original Complaint in this action through and including February 18, 2022.

In support of this Motion, the movants show unto the Court the following:

1. Defendants Smith Debnam Narron Drake Saintsing & Myers, LLP ("Smith Debnam") and Jerry T. Myers were served with Plaintiff's Original Complaint on December 28, 2021 by certified mail.
2. Plaintiff filed his Amended Original Complaint on January 7, 2022 (Doc. No. 5).
3. A summons was issued as to Defendant Melissa A. Tulis on January 7, 2022.

4. Defendant Melissa A. Tulis was served with Plaintiff's Amended Original Complaint on January 11, 2022 by certified mail.

5. The time for Defendants Smith Debnam and Jerry T. Myers to answer or otherwise respond to Plaintiff's Amended Original Complaint has not expired and the current deadline is January 28, 2022.

6. The time for Defendant Melissa A. Tulis to respond to Plaintiff's Amended Original Complaint has not expired and the current deadline is February 1, 2022.

7. The movants need additional time to investigate the facts of the matter and respond to the Amended Original Complaint.

8. The plaintiff is pro se and therefore, consent to this motion has not been sought.

WHEREFORE, Defendants Smith Debnam Narron Drake Saintsing & Myers, LLP, Jerry T. Myers, and Melissa A. Tulis respectfully request that the Court grant this Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff's Amended Original Complaint up to and including February 18, 2022.

This the 14th day of January, 2022.

/s/ Caren D. Enloe
Caren D. Enloe
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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2022, I placed a copy of the foregoing document in the United States mail, first class postage prepaid, addressed as follows:

Brian D. Green
113 Indian Trail Road N.
Suite 280
Indian Trail, NC 28079

/s/ Caren D. Enloe
Caren D. Enloe
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